

United States District Court
for the
Southern District of New York
Related Case Statement

Full Caption of Later Filed Case:

Eric Young, Adam Kurtz, and David
Crystal,

Plaintiff	Case Number
vs.	1:20-cv-00169
iFinex Inc.; BFXNA Inc.; BFXWW Inc.; Tether Holdings Limited; Tether Limited; DigFinex Inc.; Tether Operations Limited; Tether International Limited; and John Does 1-50,	
Defendant	

Full Caption of Earlier Filed Case:

(including in bankruptcy appeals the relevant adversary proceeding)

David Leibowitz, Benjamin Leibowitz,
Jason Leibowitz, Aaron Leibowitz, and
Pinchas Goldshtein,

Plaintiff	Case Number
vs.	1:19-cv-09236
iFinex Inc.; BFXNA Inc.; BFXWW Inc.; Tether Holdings Limited; Tether Operations Limited; Tether Limited; Tether International Limited; DigFinex Inc.; Philip G. Potter; Giancarlo Devasini; Ludovicus Jan Van Der Velde; Reginald Fowler; Crypto Capital Corp.; and Global Trade Solutions AG,	
Defendant	

Status of Earlier Filed Case:

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Closed

(If so, set forth the procedure which resulted in closure, e.g., voluntary dismissal, settlement, court decision. Also, state whether there is an appeal pending.)

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Open

(If so, set forth procedural status and summarize any court rulings.)

On October 6, 2019, the complaint was filed in the Leibowitz action, 1:19-cv-09236. On January 3, 2020, Plaintiffs filed a motion to appoint interim class counsel.

Explain in detail the reasons for your position that the newly filed case is related to the earlier filed case.

Both actions involve common questions of law and allege that Defendants violated the same federal statutes arising from the same set of operative facts. Both cases are in the same early stage of litigation.

Both matters allege that from October 1, 2014 through the present, Defendants artificially inflated and manipulated the price of Bitcoin and related Bitcoin futures through Defendants' USD $\overline{\text{f}}$ issuances, which enabled Defendants to extract supra-competitive prices at the expense of Bitcoin and Bitcoin futures traders. There is significant overlap in the defendants in both actions.

Signature: /s/ David E. Kovel

Date: 01/08/2020

Kirby McInerney LLP

Firm: _____